Using Product Formulation Statements in the Child and Adult Care Food Program

This guidance applies to reimbursable meals and snacks served in child care centers, family day care homes, emergency shelters, at-risk afterschool care centers, and adult day care centers that participate in the U.S. Department of Agriculture's (USDA) Child and Adult Care Food Program (CACFP). For information on the CACFP meal patterns and crediting foods for children, visit the Connecticut State Department of Education's (CSDE) Meal Patterns for CACFP Child Care Programs and Crediting Foods in CACFP Child Care Programs webpages. For information on the CACFP meal patterns and crediting foods for adult participants, visit the CSDE's Meal Patterns for CACFP Adult Day Care Centers and Crediting Foods in CACFP Adult Day Care Centers webpages.



CACFP facilities must be able to document that commercial processed foods (such as pizza, chicken nuggets, and macaroni and cheese) provide the amount of the food components credited toward the CACFP meal patterns. For example, to credit cheese pizza as 2 ounces of the meat/meat alternates component, CACFP facilities must obtain documentation from the manufacturer indicating that one serving of the product contains 2 ounces of cheese.

Menu planners cannot determine the amount of the meal pattern components in a product by reading the Nutrition Facts label or ingredients statement. If a commercial processed product does not have a Child Nutrition (CN) label, CACFP facilities must obtain a product formulation statement (PFS) from the manufacturer that indicates the product's meal pattern contribution.

A PFS is a document developed by manufacturers that provides specific information about how a product credits toward the USDA meal patterns for Child Nutrition Programs. It generally includes a detailed explanation of what the product contains and indicates the amount of each ingredient in the product by weight. The information on PFS forms can vary among manufacturers because these forms are not monitored by the USDA. Table 1 shows an example of a completed PFS for a commercial grain product.







Table 1. Example of a completed PFS for a commercial grain product



United States Department of Agriculture

Food and Nutrition Service

	in Child N	Nutrition Prog	rams	
(Crediting Standards		200 Maria		equivalents))
child Nutrition (CN) Program Operators si the following information on letterhead si to choose the crediting method that best	gned by an officia	company repres	entative. CN Program	
roduct Name: Wheat Smile Pand	akes		Code No.: 1234	56
Manufacturer: ABC Bread Compa				rams (1.75 ounces)
minute and it	7	_		culate creditable grain amount)
Does the product meet the Whole Gra	in-Rich Criteria:	Yes X N	lo	
Does the product contain non-credita Products with more than 0.24 ounce (oz. f non-creditable grains may not credit to	equivalent (eq.)	or 3.99 grams (g) i		
I. Use Exhibit A: Grain Requirements for G (baked goods), Group H (cereal grain alculate servings of grain component be z. eq.; Group H uses the standard of 28 adicate to which Exhibit A Group (A-I) t	ins) or Group I (R' ased on creditable g creditable grain	TE breakfast cere e grains. Groups A per oz. eq.; and G	als). (Different method A-G use the standard	dologies are applied to of 16g creditable grain per
				•
DESCRIPTION OF CREDITABLE GRAIN INGREDIENT*	GRAM: CREDITABL INGREDIE PORTI	EGRAIN (NT PER PI ON'	RAM STANDARD OF CREDITABLE GRAIN ER OZ. EQUIVALENT (16g or 28g) ² B	AMOUNT
Whole-wheat flour (47%)	23.	5	16	1.4687
Enriched flour (22%)	11		16	0.6875
	1	- 1	To	tal 2.1562
	nt ³ 2.0			
Creditable grains vary by CN Program. (Serving size) X (% of creditable grain in fo	ormula). Please be	aware that serving	sizes other than gram oit A.	0.00000
Standard grams of creditable grains from Total Creditable Amount must be round otal weight (per portion) of product as p otal contribution of product (per portion	urchased 1.75 (earest quarter (0.) OUNCES		
Total Creditable Amount must be round of tall weight (per portion) of product as potal contribution of product (per portion certify that the above information is true rovides 2 oz. eq. grains. I further than 0.24 oz. eq. or 3.99g for 0.	oz. ec and correct and cr certify that non Groups A-G or 6.9	earest quarter (0.20 ounces	ounce portion of this pare not above 0.24 o	product (ready for serving) z. eq. per portion. Products
Total Creditable Amount must be round of tall weight (per portion) of product as potal contribution of product (per portion certify that the above information is true rovides 2 oz. eq. grains. I further than 0.24 oz. eq. or 3.99g for 0.	oz. ec and correct and cr certify that non Groups A-G or 6.9	earest quarter (0.2 DUNCES A- that a 1.75 -creditable grains 9g for Groups H a	ounce portion of this pare not above 0.24 o	oroduct (ready for serving) z. eq. per portion. Products e grains may not credit towards
Total Creditable Amount must be round otal weight (per portion) of product as potal contribution of product (per portion certify that the above information is true rovides 2 oz. eq. grains. I further with more than 0.24 oz. eq. or 3.99g for 0 and grain requirements for school meals. **John Smith**	oz. ec and correct and cr certify that non Groups A-G or 6.9	earest quarter (0.2 DUNCES A- that a 1.75 -creditable grains 9g for Groups H a	ounce portion of this p are not above 0.24 o and I of non-creditable	oroduct (ready for serving) z. eq. per portion. Products e grains may not credit towards
Total Creditable Amount must be round of the control of product as protection of product (per portion certify that the above information is true rovides 2	oz. ec and correct and cr certify that non Groups A-G or 6.9	earest quarter (0.2 DUNCES Athat a 1.75 -c-reditable grains 99 for Groups H a Presi Title	ounce portion of this p are not above 0.24 o and I of non-creditable	oroduct (ready for serving) z. eq. per portion. Products e grains may not credit towards

November 2019

PFS Forms versus Child Nutrition (CN) Labels

PFS forms are not the same as CN labels. CN labels are the definitive documentation for verifying a product's crediting information for the Child Nutrition Programs. Table 2 compares the criteria for CN labels and PFS forms.

Table 2. Comparison of CN labels and PFS forms					
Criteria	CN labels ¹	PFS forms			
Standard information required	✓				
Reviewed and monitored by the USDA	✓				
Includes USDA's guarantee of meal component contribution for Child Nutrition Programs	✓				
Distinct six-digit product identification number	✓				
CACFP facilities must check crediting information for accuracy		✓			

¹ For information on CN labels, review the CSDE's resource, *Using Child Nutrition (CN) Labels in the CACFP*, and visit the USDA's CN Labeling Food Manufacturers/Industry webpage.

Unlike CN labels, PFS forms are not monitored by the USDA and do not guarantee compliance with the USDA meal patterns. Therefore, CACFP facilities must check the manufacturer's crediting information for accuracy (and request supporting documentation if needed) **prior** to including the product in reimbursable meals and snacks. All creditable ingredients in the PFS must match a description in the FBG.

Manufacturers are responsible for ensuring that the product is processed to meet the meal pattern contribution stated on the PFS. CACFP facilities are responsible for verifying the crediting information on the PFS, and maintaining this documentation on file for the CSDE's Administrative Review of the CACFP

Required Information for PFS Forms

To document a product's crediting information, the manufacturer's PFS must:

- list the product name, product code, serving size, and creditable ingredients;
- indicate how the product credits toward the USDA's meal pattern requirements;
- document how the manufacturer obtained the crediting information by citing specific Child Nutrition Program resources or regulations, such as the USDA's Food Buying Guide for Child Nutrition Programs (FBG) and USDA policy on crediting foods (e.g., USDA policy memos for Child Nutrition Programs and Food and Nutrition Service (FNS) instructions for Child Nutrition Programs); and
- be prepared on company letterhead with the signature of a company official and the date of issue. The signature can be handwritten, stamped, or electronic.

PFS forms that do not meet these requirements cannot be accepted as crediting documentation. CACFP facilities must request a revised PFS (and supporting documentation if needed) from the manufacturer.

Manufacturers may modify the USDA's PFS forms for various types of commercial products. For example, cheese pizza could have crediting information for the vegetables component in addition to the meat/meat alternates and grains components. Manufacturers may choose to use one PFS to document the crediting information for each meal component, but must clearly identify how each component contributes to the meal pattern requirements. The PFS must include the information needed for CACFP sponsors to determine how the product contributes to the meal pattern requirements.



Reviewing PFS Forms

An appropriate PFS form will provide specific information about the product and show how the manufacturer obtained the meal pattern crediting information by citing Child Nutrition Program regulations or USDA resources such as USDA policy memos, FNS instructions, and other USDA policy guidance. Sponsors must review this information for accuracy using the guidance below.

1. Review the PFS prior to purchasing processed products. The USDA's Food Manufacturers/Industry webpage contains resources to assist sponsors with this process, including sample PFS forms for the meat/meat alternates, grains, fruits, and vegetables components; and other resources for reviewing crediting documentation for commercial products. These resources are listed below.

Meat/Meat Alternates

- Product Formulation Statement for Documenting Meats/Meat Alternates (M/MA) in Child Nutrition Programs (USDA): https://www.fns.usda.gov/sites/default/files/resource-files/PFS_Meats-Meat_Alternates_Fillable_508.pdf
- Questions and Answers on Alternate Protein Products (APP): https://fns-prod.azureedge.net/sites/default/files/APPindustryfaqs.pdf
- Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements (Product Analysis) for Meat/Meat Alternate (M/MA) Products: https://fns-prod.azureedge.net/sites/default/files/reviewer_checklist.pdf

Vegetables and Fruits

 Product Formulation Statement for Documenting Vegetables and Fruits in the Child and Adult Care Food Program, Summer Food Service Program, and NSLP Afterschool Snacks (USDA):

```
https://www.fns.usda.gov/sites/default/files/resource-files/PFS_Total_Veg_Fruits_Fillable_508.pdf
```

Grains

 Product Formulation Statement for Documenting Grains in Child Nutrition Programs (USDA):

```
https://www.fns.usda.gov/sites/default/files/resource-files/PFS_Grains_Oz_Eq_Fillable_508.pdf
```

- Product Formulation Statement for Documenting Grains in Child Nutrition Programs – Completed Sample (USDA): https://www.fns.usda.gov/sites/default/files/resource-files/ PFS_Example_Grains_Oz_Eq.pdf
- 2. Verify the accuracy of the PFS. Sponsors must review the information below.
 - Determine that the creditable ingredients listed in the PFS match a description in the FBG. If a PFS for a specific product claims to provide a higher meal component credit than the amount listed in the FBG, the PFS must clarify all credited ingredients and demonstrate how the product provides that credit according to the USDA's regulations, guidance, or policy.
 - Verify that the product's stated credit toward the USDA's meal pattern requirements is not greater than the serving size of the product. For example, a 2.2-ounce beef patty cannot credit for more than 2 ounces of the meat/meat alternates component.



 Assure that the creditable components are visible in the finished product. To claim a contribution toward the meat/meat alternates component, the product must have a visible meat or meat alternate (such as a sausage link, beans, cheese, or peanut butter), and the PFS must specify the method for crediting these items.

The USDA encourages careful review of product literature. Sponsors are accountable for ensuring that reimbursable meals and snacks meet the meal pattern requirements.

For additional guidance on accepting product documentation, refer to the CSDE's resource, Accepting Processed Product Documentation in the CACFP, and the USDA's handout, Tips for Evaluating a Manufacturer's Product Formulation Statement; and visit the "Crediting Commercial Processed Products in Child Care Programs" or "Crediting Commercial Processed Products in CACFP Adult Day Care Centers" sections of the CSDE's CACFP webpages.

Resources

```
Accepting Processed Product Documentation in the CACFP (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/
   Accepting_Processed_Product_Documentation_CACFP.pdf
Child and Adult Care Food Program (CSDE Webpage):
   https://portal.ct.gov/SDE/Nutrition/Child-and-Adult-Care-Food-Program
Crediting Foods in CACFP Adult Day Care Centers (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Adult-Day-Care-Centers
Crediting Foods in CACFP Child Care Programs (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Child-Care-Programs
Food and Nutrition Service (FNS) instructions (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/FNS-Instructions-for-Child-Nutrition-Programs
Food Buying Guide for Child Nutrition Programs (USDA):
   https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs
Food Manufacturers/Industry (USDA webpage):
   https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry
Laws and Regulations for Child Nutrition Programs (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/Laws-and-Regulations-for-Child-Nutrition-Programs
Meal Patterns for CACFP Adult Day Care Centers (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Adult-Centers
Meal Patterns for CACFP Child Care Programs (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs
Presentation: CN Labels and Product Formulation Statements (USDA):
   https://theicn.org/resources/930/march-2016/109876/manufacturers-product-formulation-
   statement-pfs03-31-16.pdf
Resources for the CACFP Meal Patterns (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/
   Resources_CACFP_Meal_Patterns.pdf
Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements for Meat/Meat
   Alternates (USDA):
   https://fns-prod.azureedge.net/sites/default/files/reviewer_checklist.pdf
Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA):
   https://fns-prod.azureedge.net/sites/default/files/resource-files/cnl_tipsheet-
   processedproduct.pdf
USDA Policy Memos for the Child and Adult Care Food Program (CACFP) (USDA's FNS
   Documents & Forms webpage):
   https://www.fns.usda.gov/resources
USDA Product Formulation Statements (USDA's Food Manufacturers/Industry webpage):
```

https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry



For more information, visit the CSDE's Crediting Foods in CACFP Child Care Programs and Crediting Foods in CACFP Adult Day Care Centers webpages, or contact the CACFP staff in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at http://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/Using_Product_Formulation_Statements_CACFP.pdf.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

The Connecticut State Department of Education is committed to a policy of equal opportunity/affirmative action for all qualified persons. The Connecticut Department of Education does not discriminate in any employment practice, education program, or educational activity on the basis of age, ancestry, color, criminal record (in state employment and licensing), gender identity or expression, genetic information, intellectual disability, learning disability, marital status, mental disability (past or present), national origin, physical disability (including blindness), race, religious creed, retaliation for previously opposed discrimination or coercion, sex (pregnancy or sexual harassment), sexual orientation, veteran status or workplace hazards to reproductive systems, unless there is a bona fide occupational qualification excluding persons in any of the aforementioned protected classes.

Inquiries regarding the Connecticut State Department of Education's nondiscrimination policies should be directed to: Levy Gillespie, Equal Employment Opportunity Director/Americans with Disabilities Coordinator (ADA), Connecticut State Department of Education, 450 Columbus Boulevard, Suite 505, Hartford, CT 06103, 860-807-2071, levy.gillespie@ct.gov.